

REMARKS

The Office Action mailed December 21, 2006 has been reviewed and carefully considered. No new matter has been added.

Claims 1-11 have been amended. New Claims 12-17 have been added. Claims 1-17 are pending.

The drawings have been objected to. Figure 1 has been amended to now include the legend "PRIOR ART". Accordingly, a replacement sheet, so labeled, is enclosed herewith providing said legend. Withdrawal of the objection is respectfully requested.

Claims 1-11 have been objected to. The figure reference numerals in corresponding parenthesis have all been deleted from Claims 1-11. In addition, Claim 6 has been amended per the Examiner's suggestion, replacing "an simple" with "a simple". Withdrawal of the objection is respectfully requested.

Claims 1-11 stands rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,916,0087 to Hammond et al. (hereinafter "Hammond") in view of U.S. Patent No. 6,862,564 to Shue et al. (hereinafter "Shue").

Independent Claim 1 is directed to a method of configuring, in a router, a physical port for coupling to a network (Claim 1, preamble). Independent Claim 10 is directed to a router having a physical port for coupling to a network (Claim 10, preamble). Independent Claim 11 is directed to a router (Claim 11, preamble).

Hammond is directed to a "transparent security proxy for unreliable message exchange protocols" (Hammond, title).

Shue is directed to a "network emulator" (Shue, title).

It is respectfully asserted that none of the cited references teach or suggest the following steps of/means for recited in each of Claims 1 and 10:

receiving a message to configure said physical port for use with said network;

associating, responsive to receiving said message, a set of mapping assignments for using said physical port to access said network; and

implementing said mapping assignments, responsive to associating said mapping assignments, to configure said physical port for coupling to said network.

It is respectfully asserted that none of the cited references teach or suggest the following limitations of Claim 11:

a plurality of physical ports selectively connectable to said LAN interface or said WAN interface ,

wherein said WAN/LAN port manager controls whether each of said plurality of physical ports is coupled to said LAN interface or said WAN interface.

According to the explicit limitations of Claims 1 and 10, a “message to configure said physical port for use with said network” is received. In contrast, the message cited by the Examiner from Hammond is a message that is sent from a client to a server (Hammond, col. 4, line 65 to col. 5, line 17), and has nothing to do with configuring a physical port for use with a network unlike the message recited in Claims 1 and 10. That is, a “firewall simply keeps a list of addresses of server attached to it, and accepts all messages intended for such servers”. Thus, the messages are not sent to configure a physical port, as required by the limitations of Claims 1 and 10.

Moreover, the preceding limitations of Claims 1 and 10 call for the message to be received by a router. In contrast, the message disclosed in Hammond is sent from a client to a server, and is intercepted by a firewall attached to the server (Hammond, col. 4, line 65 to col. 5, line 17). Neither the client, the server, nor the firewall correspond to a router as recited in Claims 1 and 10.

Accordingly, Hammond does not show these limitations of Claims 1 and 10, and Shue is silent with respect to these limitations.

Moreover, according to the explicit limitations of Claims 1 and 10, “mapping assignments [are implemented], responsive to associating said mapping assignments, to configure said physical port for coupling to said network”. In contrast, Hammond is not configuring a physical port, but rather is binding a particular message to a particular logical port (see Hammond, col. 4, line 65 to col. 5, line 16). That is, Hammond is routing a particular message to a particular logical port depending upon,

for example, an address in a corresponding message. Accordingly, Hammond is not disclosing configuring said port (physical or otherwise) for coupling to said network as recited in Claims 1 and 10, but rather is disclosing routing a particular message, intended for a server and having nothing to do with configuring a router, for coupling to (receipt by) the server. Of course, a server is not a network. Thus, configuring a port to receive messages intended for a particular server does not correspond to configuring a router for coupling to a network, as recited in Claims 1 and 10.

Accordingly, Hammond does not show these limitations of Claims 1 and 10, and Shue is silent with respect to these limitations.

Further, assuming *arguendo* that Shue even teaches a physical port in the first place, Hammond is deficient in showing the preceding limitations of Claims 1 and 10. Moreover, a physical port does not correspond to a logical port, and a simple replacement of a logical port as disclosed by Hammond with a physical port as allegedly disclosed by Shue is not permissible given the differences between the two types of ports. For example, a logical port, simply changed by a replacement of an address for the logical port, cannot be said to equate to the dedicated hardware such as dedicated hardware paths and so forth inherent in a physical port.

Accordingly, neither Hammond nor Shue, either taken singly or in combination, teach or suggest all of the limitations of Claims 1 and 10.

Regarding Claim 11, the Examiner has failed to explicitly show any particular portion of either Hammond or Shue that disclose “wherein said WAN/LAN port manager controls whether each of said plurality of physical ports is coupled to said LAN interface or said WAN interface”, as recited in Claim 11. This is not surprising, as neither Hammond nor Shue teach or even remotely suggest the preceding limitations of Claim 11. While col. 1, lines 21-28 of Hammond recite a private network such as a local area network LAN connected to the Internet, this defines a coupling of both, the LAN to the Internet, while the claim limitation couples each respective physical port to a LAN interface OR a WAN interface.

Accordingly, neither Hammond nor Shue, either taken singly or in combination, teach or suggest all of the limitations of Claim 11.

“To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art” (MPEP §2143.03, citing *In re Royka*, 490 F.2d

981, 180 USPQ 580 (CCPA 1974)). “If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious” (MPEP §2143.03, citing *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)).

Thus, independent Claims 1, 10, and 11 are patentably distinct and non-obvious over the cited references for at least the reasons set forth above.

Claims 2-9 depend from Claim 1 and thus include all the limitations of Claim 1. Accordingly, Claims 2-9 are patentably distinct and non-obvious over the cited references for at least the reasons set forth above with respect to Claim 1.

Moreover, said dependent claims include patentable subject matter in and of themselves and are, thus, patentable distinct and non-obvious over the cited references in their own right. For example, it is respectfully asserted that none of the cited references, either taken singly or in combination, teach or suggest “wherein said network is a Local Area Network (LAN) prior to said step of implementing and is a Wide Area Network (WAN) after said step of implementing”, as recited in Claim 5. In support of his rejection of Claim 5, the Examiner stated “see col. 1, lines 21-28 [of Hammond] which recite the private network such as a local area network LAN connected to the Internet, i.e., WAN)”. However, Claim 5 is essentially recited that a conversion has taken place in that the network previously connected to the physical port prior to configuring per said implementing step is a LAN while subsequent to configuring per said implementing step is a WAN. In contrast, the cited portion of Hammond as well as the Examiner’s remarks simply show two network connected together, i.e., a LAN connected to a WAN, and not a “transformation” or “configuration” with corresponding result as per the limitations of Claim 5.

Thus, reconsideration of the rejections is respectfully requested.

Moreover, as noted above, new Claims 12-17 have been added. Support for Claims 12-17 may be found at least at page 1, line 31 to page 2, line 22 of the Applicant’s specification. It is respectfully asserted that none of the cited references, either taken singly or in combination, teach or suggest “wherein said implementing step changes the physical port from a secure type physical port to a non-secure type physical port or from the non-secure type physical port to the secure type physical port” or “wherein said implementing means changes the physical port from a secure type physical port to a non-secure type physical port or from the non-secure type physical port to the secure type physical port”, as recited in Claims 12 and 13, respectively. Moreover, it is respectfully asserted that none of

the cited references, either taken singly or in combination, teach or suggest “wherein said implementing step changes the physical port from a WAN type physical port to a LAN type physical port or from the LAN type physical port to the WAN type physical port” and “wherein said implementing means changes the physical port from a WAN type physical port to a LAN type physical port or from the LAN type physical port to the WAN type physical port”, as recited in Claims 14 and 15. Further, it is respectfully asserted that none of the cited references, either taken singly or in combination, teach or suggest “wherein said implementing step alters an initial designation of the physical port by a manufacturer of the router as one of a LAN type port or a WAN type port to one of the WAN type port or the LAN type port, respectively” and “wherein said implementing means alters an initial designation of the physical port by a manufacturer of the router as one of a LAN type port or a WAN type port to one of the WAN type port or the LAN type port, respectively”, as recited in Claims 16 and 17, respectively. That is, both references are completely silent with respect to the preceding limitations of Claims 12-17. Accordingly, Claims 12-17 are patentably distinct and non-obvious over the cited references for at least the reasons set forth above. Moreover, Claims 12, 14, and 16 depend from Claim 1 and thus include all the limitations of Claim 1, and Claims 13, 15, and 17 depend from Claims 10 and thus include all the limitations of Claim 10. Accordingly, Claims 12, 14, and 16 are patentably distinct and non-obvious over the cited references for at least the reasons set forth above with respect to Claim 1, and Claims 13, 15, and 17 are patentably distinct and non-obvious over the cited references for at least the reasons set forth above with respect to Claim 10.

In view of the foregoing, Applicants respectfully request that the rejection of the claims set forth in the Office Action of December 21, 2006 be withdrawn, that pending claims 1-17 be allowed, and that the case proceed to early issuance of Letters Patent in due course.

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No fee is believed due with regard to the filing of this amendment. However, if a fee is due, please charge Deposit Account No. 07-0832.

Respectfully submitted,

By: /Guy H. Eriksen/

Patent Operations
Thomson Licensing Inc.
P.O. Box 5312
Princeton, NJ 08543-5312

Guy H. Eriksen, Attorney for Applicants
Registration No.: 41,736
(609) 734-6807

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